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December 13, 2002 26 2002

Marlene H. Dortch  
Secretary  
Federal Communication Commission  
445-12<sup>th</sup> Street, SW  
Room TW-B204  
Washington, DC 20054

RE: *In the Matter of Investigation of Alascom, Inc. Interstate Transport  
& Switching Services - Alascom Inc., FCC Tariff No. 11*  
CC Docket No. 95-182

Dear Secretary Dortch:

Enclosed is a Certificate of Service which we inadvertently did not include with our electronic filing filed yesterday in the above-referenced docket on behalf of ACS Long Distance.

Sincerely,

*E. H. Ross*

Elisabeth H. Ross  
Attorney for ACS-Long Distance

Enclosure

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

REC 26 2002

In the Matter of

Investigation of Alascom, Inc.  
Interstate Transport and  
Switching Services

CC Docket No. 95-182

Alascom, Inc., FCC Tariff No. 11

**ACS-LD's RESPONSE TO ALASCOM'S STATEMENT**

ACS Long Distance ("ACS-LD"), formerly known as ATU-Long Distance, opposes Alascom's Tariff F.C.C.No. 11 ("Tariff 11") statement filed on November 27,2002 in this docket, and asks that the Commission order Alascom to make its annual filing as required.

In lieu of filing revised rates, Alascom has chosen to file a statement indicating that the filing process for revising Tariff 11 is too "burdensome" and "wasteful" of company and Commission resources. ACS-LD strongly objects to Alascom's aversion to filing a revised Tariff 11. Alascom's failure to analyze its current rates, determine whether they should be changed based on current data, and submit required information prohibits customers from determining whether current rates are reasonable. While Alascom has requested different regulatory treatment for the tariff, the FCC has not granted it. Alascom should not be allowed to resort to "self-help."

Tariff 11 is an extremely important tariff to promote long distance competition in Alaska. As the Commission has well documented in its Alaska Market Structure Inquiry, the costs of serving Alaska are very high. Through this tariff, other carriers serving Alaska can buy transport and switching services to avoid having to build their own facilities to serve Alaskan customers.

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The tariff enables carriers to serve the state in a more economical and efficient manner. Thus, it is important that the rates be just and reasonable.

Alascom's Tariff 11 revisions have been problematic every year. ACS-LD has filed comments repeatedly urging the Commission to suspend and investigate each tariff filing for Alascom's failure to properly supply specific information. In the past, the Commission has concurred with ACS-LD's analysis of Tariff 11 issues, stating that each of the past twelve filed tarifftransmittals (Nos. 790, 797,807, 852,921,933,937,941,942, 993, 1088, and 1184) have raised questions regarding the adequacy of Alascom's cost support and the extent to which the proposed Tariff 11 rates, terms, and conditions comply with the Communications Act and relevant Commission orders.

ACS-LD respectfully requests that the Commission order Alascom to comply and that the Commission conduct the inquiry it has reinstated each year.

DATED: December 12,2002

Respectfully submitted,

ACS LONG DISTANCE

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